

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

Insurance Company of Greater New York, a/s/o
Chelsea Crossing of Southfield Condominium

Plaintiff(s),

Case No. 22-CV-11030

v.

Judge David M. Lawson



Deanna Johnson

Magistrate Judge



Defendant(s).

_____ /

REQUEST FOR CLERK'S ENTRY OF DEFAULT JUDGMENT

To: Clerk of the Court

Pursuant to Rule 55(b) of the Federal Rules of Civil Procedure and E. D. Mich. LR 55.2, it is requested that the Clerk of Court enter a judgment by default against

- Deanna Johnson

Please review the Affidavit of Sum Certain.

AFFIDAVIT

In support of the Request for Clerk's Entry of Default Judgment, I hereby declare under penalty of perjury that the following statements are true and correct:

1. Deanna Johnson is subject to default judgment.
2. A default has been entered on Deanna Johnson because the party has failed to plead or otherwise defend in accordance with Fed. R. Civ. P. 55(a).
3. The named party is not an infant, incompetent person or currently in the military service.

4. The plaintiff is entitled to the following judgment in the amount of \$ 387,754.77 for damages, costs, other:

See the attached Ex. A for a detailed breakdown of the costs incurred in repairing the fire damaged building.

Date: December 19, 2022

/s/ Brian Devilling

6277371
Foran Glennon Palandech Ponzi & Rudloff PC
222 North LaSalle St., Suite 14000
Chicago, IL 60606
(312) 863-5015
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Insured: Chelsea Crossing of Southfield Condominium Association
 Crawford Reference: 3431948
 Client Reference: F068181501
 Loss Location: 29752 Farmbrook Villa Ln, Southfield, MI 48034
 Date of Loss: 5/21/2019
 Adjuster: Steve Landon



Balance Summary	
Building:	\$ 96,307.20
ICC:	\$ -
Total:	\$ 96,307.20

Building								
Vendor	Description	Estimate # Invoice #	Amount	Adjusted	Under Review	RCV	DEPR	ACV
Jarvis	Emergency services invoice.	40551	\$ 781.54			\$ 781.54	\$ -	\$ 781.54
Concraft	Temporary electric performed by Cox Electric.	12/13/2019	\$ 1,560.00			\$ 1,560.00	\$ -	\$ 1,560.00
Concraft	Winterization performed by KoBelle Plumbing.	12/13/2019	\$ 637.51			\$ 637.51	\$ -	\$ 637.51
Concraft	Per JS Held reconstruction estimate.	10/24/2019	\$ 294,069.93			\$ 294,069.93		\$ 294,069.93
Concraft	Supplement for additional plumbing fixtures.	4/16/2021	\$ 1,435.23			\$ 1,435.23	\$ -	\$ 1,435.23
						\$ -	\$ -	\$ -
Totals:						\$ 298,484.21	\$ -	\$ 298,484.21
Less Deductible:								\$ (10,000.00)
Less Prior Payment:							6/18/2019	\$ (25,000.00)
Less Prior Payment:							7/25/2019	\$ (146,371.15)
Less Prior Payment:							11/12/2019	\$ (18,608.35)
Less Prior Payment:							12/10/2019	\$ (637.51)
Less Prior Payment:							1/17/2020	\$ (1,560.00)
Balance:								\$ 96,307.20

Increased Cost of Construction								
Vendor	Description	Estimate # Invoice #	Amount	Adjusted	Under Review	RCV	Pending	Incurred Cost
Concraft	Per Crawford GTS adjustment of supplemental ICC items to include building permit, separate HVAC system, water saving toilets, and other plumbing modifications.	3/3/2020	\$ 13,060.56			\$ 13,060.56	\$ -	\$ 13,060.56
IAQ	Asbestos bulk sampling.	1906-9255	\$ 1,390.00			\$ 1,390.00	\$ -	\$ 1,390.00
Concraft	Asbestos abatement completed by BDS Environmental.	12605	\$ 71,400.00			\$ 71,400.00	\$ -	\$ 71,400.00
Concraft	Code upgrades completed by Cox Electric.	818-2019	\$ 3,420.00			\$ 3,420.00	\$ -	\$ 3,420.00
						\$ -	\$ -	\$ -
Totals:						\$ 89,270.56	\$ -	\$ 89,270.56
Less Prior Payment:							11/12/2019	\$ (1,390.00)
Less Prior Payment:							3/17/2019	\$ (87,880.56)
Balance:								\$ -

*PRELIMINARY AND SUBJECT TO CARRIER APPROVAL

